



MacDermid
INCORPORATED

RCRA RECORDS CENTER
FACILITY MACDERMID
I.D. NO. CTD001164599
FILE LOC. R-1B
OTHER RDMS# 100883

SEP 13 1988

245 FREIGHT STREET - WATERBURY, CONNECTICUT 06702 - TELEPHONE (203) 575-5700 - TELEX 4436011 - FAX 203-575-7900



RDMS DocID 00100883

September 8, 1988

US EPA
Waste Management Division
HER
CAN 6
JFJ Federal Building
Boston, MA 02203

Attention: Ms. Susan Green

Subject: Soft Hammer Demonstration/Certification

Madam:

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, MacDermid, Inc. has enclosed a soft hammer deconstruction and certification as per 40 CFR 268.8 (a) (2) for EPA waste code U188.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that:

Incineration is the best practically available treatment.
(See attached demonstration for further details).

If any further information is required, please contact me at 203-575-7947

Sincerely,

Cherrie D. Gillis
Compliance Administrator

EPA ID: CTD001164599

SOFT HAMMER DEMONSTRATION

FACILITY OWNER	LOCATION	TREATMENT METHOD	CONTACT	DATE
Rollins Environmental	Route 322 Bridgeport, NJ EPA ID: NJD053288239	Incineration	Nancy Oldt	9/8/88

NOTIFICATION FOR WASTES RESTRICTED FROM LAND DISPOSAL FOR WHICH NO TREATMENT STANDARDS HAVE BEEN ESTABLISHED ("SOFT-HAMMER" WASTES)

GENERATOR'S NAME _____ MANIFEST NO. _____

GEN. EPA. ID. NUMBER _____

 Line No. ☐ 11a ☐ 11b ☐ 11c ☐ 11d

EWR STREAM NO. _____ HAZARDOUS WASTE NUMBER(S) _____

I am supplying this notice and certification to Environmental Waste Resources, Inc. in accordance with the requirements of regulations under 40 CFR 268.7 and 268.8. I have determined that I am the initial generator of a waste subject to the "soft-hammer" provisions of 40 CFR 268.33(f). Until treatment standards for this waste are established or until May 8, 1990, whichever occurs first, waste identified above is prohibited from land disposal in a landfill or surface impoundment, unless the waste will be land disposed in a land fill or surface impoundment meeting minimum technological standards, and the waste is the subject of a valid demonstration and certification pursuant to 40 CFR 268.8 and treatment, if determined to be practically available and yielding the greatest environmental benefit, is conducted in accordance with the copy of the demonstration I am supplying or have supplied.

"SOFT-HAMMER" WASTE FOR WHICH NO PRACTICALLY AVAILABLE TREATMENT EXISTS AND IS DESTINED FOR DISPOSAL IN A LANDFILL OR SURFACE IMPOUNDMENT

- I. ☐ I have made a good faith effort to locate and contract with treatment and recovery facilities practically available to treat my material identified above and have determined that no practically available treatment for this waste exists. In full accordance with 40 CFR 268.8, I have submitted a demonstration and certification to my U.S. EPA Regional Administrator that no practically available treatment exists. I will immediately notify you if any information within my demonstration changes, or if my demonstration is at any time invalidated by the Regional Administrator.
- ☐ (a) This is my first shipment of this "soft-hammer" waste, identified above, after the effective date of the regulation or under a new demonstration. I have attached a copy of the most recent demonstration and certification I submitted to my Regional Administrator.
- ☐ (b) This is a subsequent shipment of the "soft-hammer" waste identified above. A copy of the most recent demonstration and certification for this material was supplied with my first shipment. The information within the demonstration has not changed and is still correct, and, the Regional Administrator has not invalidated my demonstration and certification.

"I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

SIGNATURE _____ NAME (Print) _____ DATE _____

"SOFT-HAMMER" WASTE FOR WHICH PRACTICALLY AVAILABLE TREATMENT EXISTS PRIOR TO DISPOSAL IN A LANDFILL OR SURFACE IMPOUNDMENT

- II. ☐ I have made a determination that there is practically available treatment for the waste identified above and have contracted with Environmental Waste Resources, Inc. to provide the treatment I have determined yields the greatest environmental benefit. In full accordance with 40 CFR 268.8 I have submitted a demonstration and certification to my U.S. EPA Regional Administrator that I have determined that practically available treatment exists for the material described above and have contracted to use the technology that yields the greatest environmental benefit. I will immediately notify you if any information within my demonstration changes, or if my demonstration is invalidated by the Regional Administrator.

- ☒ (a) This is my first shipment of this "soft-hammer" waste, identified above, after the effective date of the regulation or under a new demonstration, and I have attached a copy of the most recent demonstration and certification I submitted to my Regional Administrator.
- ☐ (b) This is a subsequent shipment of the "soft-hammer" waste identified above. A copy of the most recent demonstration and certification for this material was supplied with my first shipment. The information within the demonstration has not changed and is still correct, and, the Regional Administrator has not invalidated my demonstration and certification.

"I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environments benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

 SIGNATURE Cherrie D. Gills NAME (Print) Cherrie D. Gills DATE 9/8/88

"SOFT-HAMMER" WASTE DESTINED FOR LAND DISPOSAL IN UNITS OTHER THAN LANDFILL OR SURFACE IMPOUNDMENT

- III. ☐ The "soft-hammer" waste identified above is being disposed of in a land disposal unit other than a landfill or surface impoundment and is therefore not subject to the certification and demonstration requirements as applicable in 40 CFR 268.8.

I hereby certify that all information supplied above, and attached, is complete and accurate to the best of my knowledge and ability to determine that no omissions or errors exist.

NAME _____ TITLE _____

SIGNATURE _____ DATE _____



MacDermid
INCORPORATED

245 FREIGHT STREET - WATERBURY, CONNECTICUT 06702 - TELEPHONE (203) 575-5700 - TELEX 4436011 - FAX 203-575-7900

August 14, 1989

RECEIVED

AUG 22 89

HEAVY WASTE
MANAGEMENT BRANCH

Regional Administrator - EPA
JFK Federal Building
Boston, MA 02203

Gentlemen:

In accordance with the Environmental Protection Agency's land disposal restrictions governing the second third scheduled wastes, MacDermid Incorporated has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8(a) for EPA waste code(s) U135.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that:

- _____ 1. No practically available treatment exists.
(See attached demonstration for further details).
- x 2. Chemical oxidation is the best practically available treatment (see attached demonstration for further details).

If any further information is required, please contact me at (203) 575-7947.

Sincerely,

Cherrie D. Gillis
Compliance Administrator

CDG:hi

SOFT HAMMER DEMONSTRATION

FACILITY OWNER	LOCATION	TREATMENT METHOD	TELEPHONE	CONTACT	DATE	EXPLANATION*
1. BDT	Hass Research Park Clarence, NY	Chemical oxidation	716- 634-6794	George Eisenhardt	8/14/89	H
2.						
3.						

*For no available treatment: insert
number key from Attachment 3.

For available treatment: insert
the letter key from Attachment 4.

+ 2nd
ATTACHMENT 4
FIRST THIRD "SOFT-HAMMER DEMONSTRATION

Soft-Hammer Waste For Which Alternative Treatment or Recovery Has Been Located

- A Rotary Kiln Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally organic residues which are best destroyed by incineration.
- B Liquid Injection Incineration is a practically available technology that yields the greatest environmental benefit. This waste is principally pumpable organic residues which are best destroyed by incineration.
- C Fuels Blending is a practically available technology that yields the greatest environmental benefit. This waste has a heating value greater than or equal to 5,000 BTU per pound and can be best reused as a hazardous waste fuel.
- D A combination of Fuels Blending, and/or Rotary Kiln or Liquid Injection is a practically available technology that yields the greatest environmental benefit. This is due to the properties of my waste which may vary slightly, from one load to the next. Solid nondispersible residues will need to be incinerated; but the pumpable or dispersible portions may be blended for hazardous waste fuels usage (when the BTU's, chlorine, ash, etc. are within the required ranges); or else incinerated.
- E Chemical Precipitation (with filtration or decanting) is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volume of the waste.
- F Filtration is a practically available technology that yields the greatest environmental benefit. This should reduce the toxicity/mobility of the hazardous constituents by reducing the toxic volumes of the waste.
- G Stabilization is a practically available technology that yields the greatest environmental benefit. Stabilization will reduce the mobility of the hazardous constituents of the waste. I have examined recovery and destruction technologies; found that they were not practically available for the following reason(s):
- H Chemical oxidation is a practically available technology that yields the greatest environmental benefit. Chemical oxidation will reduce the toxicity of hazardous constituents in the waste.

This waste is not suitable for incineration or fuels due to:

- I the low percentage of hazardous organic constituents presents,
J the low heating value of the waste,
K the high percentage of inorganic constituents present,
L the lack of located available capacity of incineration or fuels blending facilities

This waste is not suitable for recovery due to:

- M The hazardous constituents are present in concentrations that make recovery technologically impossible.
N The hazardous constituents are present in concentrations that make recovery economically infeasible.
O No recovery facilities were located that could treat this type of waste.
P No recovery facilities were located that had capacity to treat this type of waste.
Q The treatment technology identified above is a past practice that has been demonstrated to meaningfully reduce the toxicity and/or mobility of the waste.

Additional Comments:

ATTACHMENT 3

FIRST THIRD "SOFT-HAMMER" DEMONSTRATION
No Available Practical Alternative to Land Disposal

Explanation Of Why No Treatment Is Practically Available

I have not been able to locate practically available treatment or recovery for the waste described in the cover letter because, (refer to checked items, and any additional comments):

- (1) _____ No recovery facilities have been located which will be able to recover the hazardous constituents of this waste.
- (2) _____ There is no safe and legal treatment or recovery operation which I can perform practically at my site that will appreciably reduce the toxicity or mobility of the hazardous constituents of the waste.
- (3) _____ I have not been treating this waste at my site in the past, using a treatment technology which has been found to appreciably reduce the toxicity or mobility or mobility of the hazardous constituents of the waste.
- (4) _____ Stabilization treatment will not appreciably reduce the toxicity or mobility of the hazardous constituents of this waste.
- (5) _____ Incineration, thermal oxidation or other destruction technologies will not appreciably reduce the toxicity or mobility of the hazardous constituents of the waste.
- (6) _____ I have examined the possibilities of recovery/recycling, incineration, other destruction technologies, and stabilization, in that order or preference, I have not been able to locate any such treatment facilities that will accept this waste.
- (7) _____ The cost of treatment, shipment and disposal at the treatment/recovery facilities that have been located is greater than or equal to twice the cost of shipment and disposal at the RCRA landfill.

Additional Comments:

- (8) _____



MacDermid
INCORPORATED

CN

SEP 13 1988

245 FREIGHT STREET - WATERBURY, CONNECTICUT 06702 - TELEPHONE (203) 575-5700 - TELEX 4436011 - FAX 203-575-7900

September 7, 1988

US EPA
Waste Management Division
HER
CAN 6
JFK Federal Building
Boston, MA 02203

Attention: Ms. Susan Green

Subject: Soft Hammer Demonstration/Certification

Madam:

In accordance with the Environmental Protection Agency's land disposal restrictions governing the first third scheduled wastes, MacDermid, Inc. has enclosed a soft hammer demonstration and certification as per 40 CFR 268.8 (a) (2) for EPA waste codes F007 and F009.

The demonstration reflects our efforts to locate practically available treatment that affords the greatest environmental benefit. Based on our search for such treatment we have determined that:

Cyanide Destruction is the best practically available treatment.
(See attached demonstration for further details).

If any further information is required, please contact me at 203-575-7947.

Sincerely,

Cherrie D. Gillis
Compliance Administrator

EPA ID: CTD981069854

SOFT HAMMER DEMONSTRATION

FACILITY OWNER	LOCATION	TREATMENT METHOD	CONTACT	DATE	EXPLANATION*
----------------	----------	------------------	---------	------	--------------

- | | | | | | |
|-------------|---|--|---------------|---------|--|
| 1. Cyanoken | 12381 Schaefer Dr
Detroit, MI
EPA ID: MID098011992 | Alkaline Chlorination-
Cyanide Destruction | Sandy Shugars | 9/7/88 | |
| 2. EWR | 130 Freight St
Waterbury, CT 06702
EPA ID: CTD072138969 | Storage Facility-
Broker - No treatment
method available | Todd Johnson | 8/31/88 | |

**NOTIFICATION FOR WASTES RESTRICTED FROM LAND DISPOSAL
FOR WHICH NO TREATMENT STANDARDS HAVE BEEN ESTABLISHED
("SOFT-HAMMER" WASTES)**

GENERATOR'S NAME Mac Dermid, Inc MANIFEST NO. _____
 GEN. EPA ID. NUMBER CITD198110162181514 Line No. ☐ 11a ☐ 11b ☐ 11c ☐ 11d
 EWR STREAM NO. 21894 HAZARDOUS WASTE NUMBER(S) _____

I am supplying this notice and certification to Environmental Waste Resources, Inc. in accordance with the requirements of regulations under 40 CFR 268.7 and 268.8. I have determined that I am the initial generator of a waste subject to the "soft-hammer" provisions of 40 CFR 268.33(l). Until treatment standards for this waste are established or until May 8, 1990, whichever occurs first, waste identified above is prohibited from land disposal in a landfill or surface impoundment, unless the waste will be land disposed in a land fill or surface impoundment meeting minimum technological standards, and the waste is the subject of a valid demonstration and certification pursuant to 40 CFR 268.8 and treatment, if determined to be practically available and yielding the greatest environmental benefit, is conducted in accordance with the copy of the demonstration I am supplying or have supplied.

**"SOFT-HAMMER" WASTE FOR WHICH NO PRACTICALLY AVAILABLE TREATMENT EXISTS
AND IS DESTINED FOR DISPOSAL IN A LANDFILL OR SURFACE IMPOUNDMENT**

- I. ☐ I have made a good faith effort to locate and contract with treatment and recovery facilities practically available to treat my material identified above and have determined that no practically available treatment for this waste exists. In full accordance with 40 CFR 268.8, I have submitted a demonstration and certification to my U.S. EPA Regional Administrator that no practically available treatment exists. I will immediately notify you if any information within my demonstration changes, or if my demonstration is at any time invalidated by the Regional Administrator.
- ☐ (a) This is my first shipment of this "soft-hammer" waste, identified above, after the effective date of the regulation or under a new demonstration. I have attached a copy of the most recent demonstration and certification I submitted to my Regional Administrator.
- ☐ (b) This is a subsequent shipment of the "soft-hammer" waste identified above. A copy of the most recent demonstration and certification for this material was supplied with my first shipment. The information within the demonstration has not changed and is still correct, and, the Regional Administrator has not invalidated my demonstration and certification.

"I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

SIGNATURE _____ NAME (Print) _____ DATE _____

**"SOFT-HAMMER" WASTE FOR WHICH PRACTICALLY AVAILABLE TREATMENT EXISTS
PRIOR TO DISPOSAL IN A LANDFILL OR SURFACE IMPOUNDMENT**

- II. ☒ I have made a determination that there is practically available treatment for the waste identified above and have contracted with Environmental Waste Resources, Inc. to provide the treatment I have determined yields the greatest environmental benefit. In full accordance with 40 CFR 268.8 I have submitted a demonstration and certification to my U.S. EPA Regional Administrator that I have determined that practically available treatment exists for the material described above and have contracted to use the technology that yields the greatest environmental benefit. I will immediately notify you if any information within my demonstration changes, or if my demonstration is invalidated by the Regional Administrator.

- ☒ (a) This is my first shipment of this "soft-hammer" waste, identified above, after the effective date of the regulation or under a new demonstration, and I have attached a copy of the most recent demonstration and certification I submitted to my Regional Administrator.
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"I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environments benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

SIGNATURE Cherrie Grills NAME (Print) Cherrie Grills DATE 9/7/88

**"SOFT-HAMMER" WASTE DESTINED FOR LAND DISPOSAL IN UNITS OTHER THAN
LANDFILL OR SURFACE IMPOUNDMENT**

- III. ☐ The "soft-hammer" waste identified above is being disposed of in a land disposal unit other than a landfill or surface impoundment and is therefore not subject to the certification and demonstration requirements as applicable in 40 CFR 268.8.

I hereby certify that all information supplied above, and attached, is complete and accurate to the best of my knowledge and ability to determine that no omissions or errors exist.

NAME _____ TITLE _____

SIGNATURE _____ DATE _____

Cyanide 7007
AC13839

**NOTIFICATION FOR WASTES RESTRICTED FROM LAND DISPOSAL
FOR WHICH NO TREATMENT STANDARDS HAVE BEEN ESTABLISHED
("SOFT-HAMMER" WASTES)**

GENERATOR'S NAME MacDermid Inc MANIFEST NO. _____
 GEN. EPA ID. NUMBER CITD 918110162181514 Line No. ☐ 11a ☐ 11b ☐ 11c ☐ 11d
 EWR STREAM NO. AC13839 HAZARDOUS WASTE NUMBER(S) _____

I am supplying this notice and certification to Environmental Waste Resources, Inc. in accordance with the requirements of regulations under 40 CFR 268.7 and 268.8. I have determined that I am the initial generator of a waste subject to the "soft-hammer" provisions of 40 CFR 268.33(l). Until treatment standards for this waste are established or until May 8, 1990, whichever occurs first, waste identified above is prohibited from land disposal in a landfill or surface impoundment, unless the waste will be land disposed in a land fill or surface impoundment meeting minimum technological standards, and the waste is the subject of a valid demonstration and certification pursuant to 40 CFR 268.8 and treatment, if determined to be practically available and yielding the greatest environmental benefit, is conducted in accordance with the copy of the demonstration I am supplying or have supplied.

**"SOFT-HAMMER" WASTE FOR WHICH NO PRACTICALLY AVAILABLE TREATMENT EXISTS
AND IS DESTINED FOR DISPOSAL IN A LANDFILL OR SURFACE IMPOUNDMENT**

- I. ☐ I have made a good faith effort to locate and contract with treatment and recovery facilities practically available to treat my material identified above and have determined that no practically available treatment for this waste exists. In full accordance with 40 CFR 268.8, I have submitted a demonstration and certification to my U.S. EPA Regional Administrator that no practically available treatment exists. I will immediately notify you if any information within my demonstration changes, or if my demonstration is at any time invalidated by the Regional Administrator.
- ☐ (a) This is my first shipment of this "soft-hammer" waste, identified above, after the effective date of the regulation or under a new demonstration. I have attached a copy of the most recent demonstration and certification I submitted to my Regional Administrator.
- ☐ (b) This is a subsequent shipment of the "soft-hammer" waste identified above. A copy of the most recent demonstration and certification for this material was supplied with my first shipment. The information within the demonstration has not changed and is still correct, and, the Regional Administrator has not invalidated my demonstration and certification.

"I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that disposal in a landfill or surface impoundment is the only practical alternative to treatment currently available. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

SIGNATURE _____ NAME (Print) _____ DATE _____

**"SOFT-HAMMER" WASTE FOR WHICH PRACTICALLY AVAILABLE TREATMENT EXISTS
PRIOR TO DISPOSAL IN A LANDFILL OR SURFACE IMPOUNDMENT**

- II. ☒ I have made a determination that there is practically available treatment for the waste identified above and have contracted with Environmental Waste Resources, Inc. to provide the treatment I have determined yields the greatest environmental benefit. In full accordance with 40 CFR 268.8 I have submitted a demonstration and certification to my U.S. EPA Regional Administrator that I have determined that practically available treatment exists for the material described above and have contracted to use the technology that yields the greatest environmental benefit. I will immediately notify you if any information within my demonstration changes, or if my demonstration is invalidated by the Regional Administrator.

- ☒ (a) This is my first shipment of this "soft-hammer" waste, identified above, after the effective date of the regulation or under a new demonstration, and I have attached a copy of the most recent demonstration and certification I submitted to my Regional Administrator.
- ☐ (b) This is a subsequent shipment of the "soft-hammer" waste identified above. A copy of the most recent demonstration and certification for this material was supplied with my first shipment. The information within the demonstration has not changed and is still correct, and, the Regional Administrator has not invalidated my demonstration and certification.

"I certify under penalty of law that the requirements of 40 CFR 268.8 (a) (1) have been met and that I have contracted to treat my waste (or will otherwise provide treatment) by the practically available technology which yields the greatest environments benefit, as indicated in my demonstration. I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

SIGNATURE Cherrie Gills NAME (Print) Cherrie Gills DATE 9/7/88

**"SOFT-HAMMER" WASTE DESTINED FOR LAND DISPOSAL IN UNITS OTHER THAN
LANDFILL OR SURFACE IMPOUNDMENT**

- III. ☐ The "soft-hammer" waste identified above is being disposed of in a land disposal unit other than a landfill or surface impoundment and is therefore not subject to the certification and demonstration requirements as applicable in 40 CFR 268.8.

I hereby certify that all information supplied above, and attached, is complete and accurate to the best of my knowledge and ability to determine that no omissions or errors exist.

NAME _____ TITLE _____

SIGNATURE _____ DATE _____

CHARLES D. GILLIS - Compliance Administrator
MAC DERMID INCORPORATED

245 FRONT ST

WATERBURY, CT 06702

EPA ID # CTD001164599

6/20/89

9/25/89

10/17/89

SOL - U239

6/20/89

note should be designated as U159

SOL - U159, U226

MAC (A) - U226

misclass. as U226

(10/17/89)

U154

CERT

EPA ID # CTD 9#1069854

2/3 F007, F009